

exercise of such civil rights as do not interfere with the naval use of the reservations."

In a recent Puerto Rico case⁷ the issue involved was whether a summons personally served on a defendant in the United States Naval Base at San Juan conferred jurisdiction on the insular court where the action was filed against the person of the defendant. The trial court had dismissed the motion of the defendant that the summons be stricken and held that the jurisdiction of the Government of the United States over the naval base "is limited to such jurisdiction as may be necessary for the Federal Government to carry out and effectuate the purpose for which such lands were acquired."⁸ The United States was not a party to the action, but because of the importance of the issue involved, it appeared as *amicus curiae*. It did not claim exclusive jurisdiction by virtue of any inherent or sovereign power over its own lands which were being used for governmental purposes, but rather because jurisdiction had been expressly ceded by the People of Puerto Rico. The land had been conveyed to the United States by the Governor of Puerto Rico pursuant to an act of the Legislature of Puerto Rico authorizing such conveyance for military purposes. The United States asserted exclusive jurisdiction over the land pursuant to an act of the Legislature of Puerto Rico⁹ which consented to the acquisition by the United States "by purchase or condemnation" of lands within the Island of Puerto Rico, and which provided that when so acquired and possession thereof had been taken by the United States, "all jurisdiction of the People of Puerto Rico shall cease and determine." However, the Supreme Court of Puerto Rico held that the transfer of the lands by the Governor did not constitute a "purchase" within the purview of the Puerto Rican statute and that the United States, therefore, had not acquired exclusive jurisdiction over the same.

From the foregoing it will be seen that the municipal laws of territorial and insular governments, which have been granted autonomy by Congress, are valid within Federal reservations, if they do not conflict with Federal law and their enforcement does not interfere with governmental functions. However, it should be remembered that such laws are always subject to the supervision of Congress.¹⁰ All powers of a territorial government are derived from and are subordinate to the authority of the Federal Government.¹¹ Its laws are always subject to annulment by Congress.¹²

⁷ *Earl L. Moore v. District Court of Judicial District of Bayamon*, decided Dec. 22, 1941.

⁸ Citing *United States v. Unzeuta*, 281 U. S. 138; *Ryan v. State*, 186 Wash. 115, 61 Pac. (2) 1275; *Fort Leavenworth v. Lowe*, 114 U. S. 525.

⁹ Approved Feb. 16, 1903.

¹⁰ *Hornbuckle v. Toombs*, 18 Wall. 64, 21 L. ed. 266; *Oklahoma K. & M. I. Ry. Co. v. Bowling Green*, 249 Fed. 592.

¹¹ *Snow v. United States*, 18 Wall. 317, 21 L. ed. 784; *Reynolds v. People*, 1 Colo. 179.

¹² *Wright v. Ynchausti & Co.*, 272 U. S. 640, 47 S. Ct. 229; 71 L. ed. 454; *Brunswick First National Bank v. Yankton County*, 101 U. S. 129, 25 L. ed. 1046.